

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KEITH STANSELL, *et al.*,

Plaintiffs,

V.

REVOLUTIONARY ARMED FORCES OF COLOMBIA (FARC), *et al.*,

Defendants.

OLIVIA PESCATORE, *et al.*,

Plaintiffs,

V.

JUVENAL OVIDIO RICARDO
PALMERA PINEDA, *et al.*,

Defendants.

No. 1:16 Misc. 00405-LGS

No. 1:18-mc-00545-LGS

STIPULATION REGARDING FILINGS IN RELATED CASES

Plaintiffs Keith Stansell, *et al.*, and Olivia Pescatore, *et al.* (collectively, “Plaintiffs”) and third-party Garnishee Equiniti Trust Company (“Equiniti”) jointly propose and stipulate as follows:

Whereas, the case docketed at *Stansell v. FARC*, No. 1:16-mc-00405-LGS (“*Stansell*”) and the case docketed at *Pescatore v. Pineda, et al.*, No. 1:18-mc-00545-LGS (“*Pescatore*”) have been recognized as related cases pursuant to the ECF notice dated March 5, 2021;

Whereas, on March 29, 2021, the Court entered an Order¹ (the “Order”) setting a date of April 15, 2021 for the filing of third-party complaints seeking interpleader relief (the

¹ ECF No. 196 in *Stansell v. FARC*, No. 1:16-mc-00405-LGS, and ECF No. 102 in *Pescatore v. Pineda, et al.*, No. 1:18-mc-00545-LGS.

“Interpleader Complaints”) related to motions for turnover pending at ECF Nos. 121, 145, 147, 138, 141, and 143 on the *Stansell* docket, and at ECF Nos. 48, 64, 68, 72, and 74 on the *Pescatore* docket;

Whereas, each motion for turnover in the *Stansell* case relates to the same assets and/or accounts as an equivalent turnover motion filed in the *Pescatore* case and *vice versa* as set forth in the parties’ Joint Letter dated March 23, 2021, and each Interpleader Complaint for each asset and/or account shall relate to the same respondents/adverse claimants in both actions;

Whereas, to strictly comply with the Order, Equiniti would be required to file a substantially identical interpleader complaint on each docket for each analogous motion for turnover, thereby generating duplicative third-party actions; and

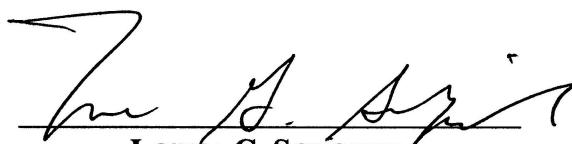
Whereas, Plaintiffs and Equiniti wish to avoid duplicative proceedings and any doubt regarding compliance with the Order;

Now, therefore, Plaintiffs and Equiniti hereby stipulate that:

1. Equiniti shall file its Interpleader Complaint only on the *Stansell* docket;
2. The *Pescatore* turnover motion shall be resolved through the Interpleader Complaint.

So Ordered.

Dated: April 16, 2021
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
April 15, 2021

Respectfully submitted,

/s/ Nathaniel A. Tarnor

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